

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT GROUP,	:	CIVIL ACTION NO.
Plaintiff,	:	02-CV-3830
v.	:	Judge Legrome B. Davis
ADVANCED ENVIRONMENTAL	:	
TECHNOLOGY CORPORATION, ET AL.	:	
Defendants.	:	

**MOTION OF DEFENDANT CARPENTER TECHNOLOGY CORPORATION TO
COMPEL ANSWERS TO CERTAIN CONTENTION INTERROGATORIES AND
TO CERTAIN OF DEFENDANTS' JOINT CONTENTION INTERROGATORIES**

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Eastern District of Pennsylvania Local Civil Rule 7.1 and 26.1, and paragraph A. 4. of the Court's Tenth Case Management Order dated April 30, 2007, Defendant Carpenter Technology Corporation ("Carpenter") respectfully moves this Court to compel Plaintiffs to respond to Carpenter's Contention Interrogatories, as follows:

1. Plaintiffs shall withdraw all general and specific objections to Carpenter's Contention Interrogatories based upon the form of the interrogatory or because the interrogatory requested Plaintiffs to state a contention that was not part of Plaintiffs' prima facie case.
2. Plaintiffs shall withdraw all general and specific objections to Defendants' Joint Contention Interrogatories Nos. 1-66 and Nos. 78-111 based upon the form of the interrogatory or because the interrogatory requested Plaintiffs to state a contention that was not part of Plaintiffs' prima facie case.

3. Plaintiffs shall serve full and complete responses to Carpenter's Contention Interrogatories Nos. 2, 3, 4, 5 and 6, including full and complete responses to each subpart thereof.

4. Plaintiffs shall serve full and complete responses to Defendants' Joint Contention Interrogatories Nos. 1-66 and Nos. 78-111, including full and complete responses to each subpart thereof.

Plaintiff has in good faith conferred with Plaintiffs in an effort to resolve this dispute and secure adequate answers without the Court's intervention.

The grounds for Carpenter's motion are more fully set forth in the accompanying Memorandum of Law, which Memorandum is incorporated by reference. A proposed Order is attached pursuant to Local Rule 7.1.

Respectfully submitted,
**EDWARDS ANGELL
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/s/

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Dated: June 4, 2007